



## **"A Right to Protection"**

### **Follow-up Vetting Review: October 2006 – March 2007**

#### **Chapter 1**

##### **1.0 Introduction and Background**

- 1.1 In June 2004, Nigel Williams, the Northern Ireland Commissioner for Children and Young People<sup>1</sup> (NICCY) initiated a Review of the arrangements for those who work (both in a paid and voluntary capacity) with children and young people in Northern Ireland. In the previous December (2003), the Commissioner was concerned to ensure that the failures apparent in the case of Ian Huntley<sup>2</sup> in terms of checking and passing on relevant conviction and non conviction information to the employing authority, should not be replicated in Northern Ireland.
- 1.2 Under Articles 7(2) (3) and (4) of the NICCY legislation, the Commissioner has a duty to keep under review the adequacy and effectiveness of law, practice and services relating to children and young people, and is required to advise the Secretary of State on matters concerning the rights and best interests of children and young people in Northern Ireland. It was to fulfil this duty that the Commissioner undertook the initial review of vetting, chaired by independent Barrister, Ruth Lavery.
- 1.3 A report<sup>3</sup>, along with the Commissioner's priority recommendations, was presented to the Secretary of State, Peter Hain, in June 2005.
- 1.4 In summary, the Review demonstrated that although systems and procedures were in place, these were often complex, were not clearly understood and/or were not universally adopted by employers of staff and volunteers who apply to work with children. As a result, the Commissioner Nigel Williams proposed a set of recommendations for action within five major areas:

---

<sup>1</sup> The principal aim of the Children's Commissioner, as detailed in The Commissioner for Children and Young People (Northern Ireland) Order 2003, is to safeguard and promote the rights and best interests of children and young people.

<sup>2</sup> Ian Huntley was convicted of the murder of two young girls, Holly Wells and Jessica Chapman in August 2003

<sup>3</sup> Lavery, Ruth, "A Right to Protection" – Review of Vetting in Northern Ireland', April 2005, full report available at [www.niccy.org](http://www.niccy.org)



- Leadership
- Consistency of Policies and Auditing
- The Statutory and Policy Framework
- The Need for Clear Guidance, Training and Implementation
- National & International Co-operation

## **2.0 The Current Review**

- 2.1 An initial response to the first Review was published by way of a Ministerial Statement in Parliament on 21 June 2005 and in a published document by OFMDFM<sup>4</sup>. The Secretary of State formally agreed that a further 'update review' would be conducted in June 2006 by NICCY, with the full co-operation of all government departments. NICCY met with OFMDFM officials to discuss in detail the content of their initial response and a detailed plan for the implementation of all recommendations was requested.
- 2.2 As part of the follow-up review, between June and August 2006 NICCY developed a questionnaire to be completed by the relevant departments. The questionnaire was structured in order to assess progress made against the recommendations within the five key areas for action as highlighted by the Commissioner, and aligned to Government's commitment that this work would be led and overseen by the Ministerial sub-group on Children.
- 2.3 Based on the responses received, an analysis of the progress to date is provided in Chapter 2 of this report, with a conclusion and recommendations in Chapter 3.
- 2.4 In November 2006, NICCY wrote to The Secretary of State seeking assurance that he was satisfied with the Departmental responses to NICCY's follow-up questionnaire. Following this in February 2007, OFMDFM forwarded a copy of the Government's Action Plan in relation to vetting. NICCY has subsequently assessed the progress detailed in the Action Plan.

---

<sup>4</sup> Government Response to the Report of the Commissioner for Children & Young People in Northern Ireland – "A Right to Protection – Review of Vetting in Northern Ireland", 2005



### **3.0 Context within Northern Ireland**

It is evident that considerable work has been undertaken by a number of Government Departments in Northern Ireland in the area of safeguarding vulnerable groups. NICCY's Review compliments other changes to law, policy and practice aimed at strengthening the recruitment process for adults who want to work with children, young people and vulnerable adults, of which the key initiatives are detailed as follows:

#### **3.1 The Protection of Children and Vulnerable Adults Order (Northern Ireland) 2005**

The Protection of Children and Vulnerable Adults Order (Northern Ireland) 2005 brought into operation those Articles of the Protection of Children and Vulnerable Adults (Northern Ireland) Order 2003 which placed the Pre-Employment Consultancy Service (PECS) Register on a statutory basis by the creation of two new lists: (i) Disqualification from Working with Children; and (ii) Disqualification from Working with Vulnerable Adults.

It brought with it a statutory duty for childcare organisations to check against the lists and to refer to the Department of Health, Social Services and Public Safety (DHSSPS) for consideration of inclusion on the list(s) those individuals deemed unsuitable to work with children. The Order also brought a duty for care providers to refer to the DHSSPS for consideration of inclusion on the list(s) those individuals deemed unsuitable to work with vulnerable adults. It is now an offence for those individuals disqualified from working with children to seek work in a regulated position or for an employer to knowingly offer them work in a regulated position. The Order allows for those individuals who are included on the statutory lists a right of appeal against those listings.

#### **3.2 Safeguarding Vulnerable Groups Bill**

Following the report of the Bichard Inquiry, published in England in June 2004, and subsequent work on barring and vetting, a Bill was published on 1st March 2006 to introduce a new vetting and barring scheme that will significantly strengthen safeguarding of children and young people. The Safeguarding Vulnerable Groups Act provides for a central vetting process built on the Criminal Records Bureau (CRB), with a new independent statutory Board taking decisions on placing individuals on the "**barred list**" where evidence suggests



that they present a risk of harm to children or vulnerable adults. These developments are applicable to England and Wales; The Act intends to:

- introduce a new vetting and barring system bringing relevant information together in one place. This will integrate the current List 99 (for teachers) and the Protection of Children Act lists (for those working in childcare settings) and also provide for a new list of people barred from working with vulnerable adults to replace the Protection of Vulnerable Adults list;
- remove responsibility from Ministers for making decisions to place individuals on the “**barred list**” and transfer this responsibility with a new independent statutory board;
- enable employers, generally, to make an instant check of whether a prospective employee is on the barred list via secure online and real time access as opposed to the current paper-based process. Employers will be able to check the status of all those who are applying to work or working in jobs that bring them into close contact with children or vulnerable adults;
- update the barring list of decisions of the Board as soon as any new information becomes available, and where possible, notify relevant employers if an employee becomes barred;
- allow individuals, parents and families, including ‘Direct Payment’ recipients employing nannies, music teachers, care workers and personal tutors, to be able to make an instant online check of the status of prospective employees. Parents will not commit an offence if they employ someone who has not been through the central vetting process.

In January 2007, DHSSPS issued for consultation draft proposals to extend the Act through an Order in Council to Northern Ireland. At the same time DHSSPS also issued for consultation, proposals to develop an “Accreditation Scheme” for non-regulated organisations who employ staff or volunteers to work with children, and who will not be covered under the statutory duty to vet as per the Safeguarding Vulnerable Groups legislation.

### **3.3 Criminal Records Disclosure System**

The ECRIT Project, initially set up to address issues surrounding implementation of Part V of the Police Act in Northern Ireland, was formally converted into the ECRIT Programme in June 2006. The aim of the programme is to deliver a new criminal records disclosure system for Northern Ireland – to be called ‘Access N.I.’ In the course of their work, the ECRIT team has been required to take



account of a number of fundamental changes taking place in both technical and legislative arenas. These included reforms to the way in which criminal records are dealt with in Northern Ireland and work to create a new national vetting and barring scheme.

The current aim of the ECRIT Programme is to deliver its objectives by Summer 2007, of which the main ones include:

- establishing a legal framework for disclosing criminal history information relevant to making employment decisions, particularly in relation to those seeking work with children or vulnerable adults;
- creating a new body, supported by innovative technical and information systems, to deliver the most comprehensive disclosure services available in the UK; and strengthening relationships with other disclosure organisations, including the Criminal Records Bureau in England and Wales and Disclosure Scotland, as well as developing more robust partnership arrangements with colleagues in the Republic of Ireland.

### **3.4 Work Undertaken by the Department of Education in Northern Ireland**

In February 2006, following concerns about Schedule 1 offenders working in schools, the Department of Education (DE) produced a report and Action Plan for the Minister on measures to strengthen child protection arrangements in the Education Sector. It is evident from this report that considerable work is taking place within the Department of Education to improve systems through the development and tightening of procedures in relation to the recruitment of staff, and to ensure better protection for children and young people. Given DE's remit and responsibility, it is pleasing to note this work and the efforts made to ensure that those working in schools have greater awareness and training with regards to child protection and staff recruitment.

NICCY welcomes the development of easy to read guidance for schools by DE; training of Governors and the importance placed on developing policies, including recruitment and child protection policies, which should reduce risks to children. In particular, NICCY found the circulars issued to schools in March 2006 as evidence of clear guidance and would recommend that other Departments follow this practice by offering similar clear guidance to their funded bodies.



## **Chapter 2**

### **4.0 Analysis of Progress**

#### **General Comments**

- 4.1 From the follow-up questionnaire issued to all Government Departments, NIO and the Court Services, it is difficult to ascertain the degree to which the recommendations detailed by the Commissioner in 2005 have been progressed. However, the subsequent Action Plan provided by Government is clearer and demonstrates that key departments are taking appropriate action to ensure that systems set up to properly vet individuals are robust. In the previous Vetting Review for the Commissioner, Ruth Lavery identified significant confusion and flaws in both the systems and processes for the protection of children and young people. This resulted in the recommendations for change outlined in her report. OFMDFM and other key departments have systematically reviewed all the recommendations and advised NICCY of improvements made and planned in the Action Plan detailed at Appendix 1.
- 4.2 In addition to completing the questionnaire, each Department was asked to forward a copy of its Child Protection Policy and also its Action Plan for the previous year (June 2005-2006) for implementing the vetting review recommendations and indicate on this plan which targets the Department had completed. However, with the exception of one eight point Policy Statement on the Protection of Children from the Northern Ireland Court Service, no documents were supplied. It is assumed therefore that these do not exist or are in the process of being developed.
- 4.3 Having subsequently received the OFMDFM cross Government Action Plan, NICCY assumes that individual departments will not be pursuing departmental specific plans.
- 4.4 It is encouraging to note the responses from DHSSPS, DEL, DCAL and NICS, which give some indication that aspects of protecting children are understood and dealt with as a priority. Given the leading role in terms of POCVA, SVG Act and Accreditation that DHSSPS have, this degree of understanding is to be expected. Of note, the DHSSPS states that grantee organisations must provide a relevant child protection policy to grant making branches which, if deemed non-compliant with statutory



regulations, will result in rejection of their application. Furthermore, DEL indicated they had retrospective vetting for all staff not already covered by POCVA checks (recruited prior to 2002 or not in regulated posts).

## **5.0 Analysis of Progress against Commissioner's Recommendations**

In addition, based on the questionnaire responses, an analysis of progress is detailed against each of the specific recommendations made by the Commissioner in 2005.

### **5.1 CLEAR LEADERSHIP**

5.1.1 It is vital that everyone in the public, private and voluntary sectors understands the importance of employment checking and its place as part of child protection. This issue crosses all Government Departments whose responsibility it is to develop legislation, write policies and procedures, and monitor good practice. It is applicable to those who employ staff and volunteers across all sectors and also to self-employed people who provide services which interface with children. This means a wide spectrum of people, from the childcare worker in the nursery, home music tutor, swimming pool attendant, teacher, to the caretaker and the maintenance staff employed in schools. These are adults in positions of trust and therefore we must be assured that through employing them, we do not place our children at risk.

5.1.2 The original Review highlighted concerns about vetting and recruitment issues in Colleges of Further Education (FE). It is therefore pleasing to note that DEL issued revised and detailed Guidance to all FE Colleges and to chairs of Governing Bodies in relation to their child protection obligations, including vetting checks on recruitment.

#### **Commissioner's Recommendations 2005:**

It is my view, based on the findings of Ruth Lavery's report, that there must be effective leadership at Government level. This will involve:

- 1 a) The Secretary of State taking a personal interest in ensuring the implementation of the recommendations detailed in the Review report.
- 1 b) The establishment of an effective interdepartmental group to manage and ensure the effective co-ordination of policy and practice in this area.





**Comment from follow-up review 2006-2007:**

1 a) NICCY is confident and reassured that the Secretary of State continues to prioritise concerns about the robustness of systems to vet staff to work with children. It is important that NICCY, under its legislative remit and based on the findings of this follow-up review, honours its commitment to advise the SOS of progress made against last year's (2005) recommendations.

1 b) An interdepartmental Ministerial subgroup on children has been established. This Committee will provide oversight on the issues of vetting, as well as a broad range of wider children's issues. NICCY commends the establishment of the group and the emphasis the Children's Minister places on cross departmental working. All respondents to the current follow-up review indicated that they are represented on the group with the exception of the Department for Regional Development (DRD) who failed to provide a response to this question. NICCY is aware that our vetting review was tabled for discussion at the sub-committee on children in October 2005, but is not aware if there have been subsequent discussions, or a review of agreed actions undertaken.

NICCY notes from the Action Plan that the Ministerial sub-group will continue to have an oversight role in relation to implementation of the Vetting Report Recommendations, and other vetting reforms linked to the Bichard Co-ordination group. In order to ensure compliance with the recommendations of the Lavery Report, NICCY requires annual short reports on progress from the chair of the sub-committee on children.

## **5.2 CONSISTENT POLICIES AND AUDITING**

5.2.1 It is well documented in Ruth Lavery's Report that vetting is only one part of the safety procedures in relation to employing staff and volunteers working with children. However, her Review reveals that the fundamentals, in terms of reliable child protection policy and guidance, are not regularly in place. Indeed, there were significant inconsistencies across Government Departments and within public sector agencies. For example, gaps and weaknesses in policy and monitoring of practice were revealed within District Councils. Too often it seems that public sector bodies assume that their contact with children does not merit having particular policies in place. There is now evidence, especially from District Councils, that the climate in relation to child protection is changing; NICCY welcomes this but is concerned to ensure there is no complacency. Child Protection policies and procedures, which include





proper recruitment and selection procedures, must be regularly reviewed and monitored for compliance.

5.2.2 In this follow-up review, three respondents indicated that monitoring was not applicable to their Departments (DETI; NICS; DFP), while five said they did not monitor the vetting process in the organisations they fund (DSD; DARD; DOE; DCAL; NIO). Of these five, the NIO also added that adherence to POCVA arrangements is required. Only four respondents stated 'yes' (DRD; DEL; DE; DHSSPS), however no further details were provided as to monitoring/evaluation of their next step agencies, therefore the effectiveness of this process cannot be determined. Of these, the DHSSPS said it partially monitored its funded organisations but further clarification is required as to the number and nature of those which are not subject to any monitoring. OFMDFM did not provide a specific answer, therefore it is still not clear whether the Department monitors the vetting process in the organisations it funds. However, in the OFMDFM Action Plan of February 2007, there is a clear statement that each Department will be required as part of their audit and risk arrangements, to assess, identify and manage child protection. The statement goes on to require that Departments ensure funded organisations comply with the same processes.

#### **Commissioner's Recommendations 2005:**

2 a) The Secretary of State should ensure with immediate effect that every Department, Council, Agency, NDPB, and affiliated government body nominates a child protection manager with Board level responsibility, whose responsibility it is to develop policies and practice in relation to the employment of staff working with children, and also monitor practice in this area.

2 b) The Secretary of State should require all public bodies to sign off in the foreword to their annual account that they have an appointed Child Protection manager, that Child Protection risks are regularly assessed and minimised, and that they are following appropriate recruitment and selection guidelines.

2 c) The Permanent Secretary within each Department should ensure the implementation and monitoring of appropriate policies by their associated sponsored bodies/next step agencies/funded partnerships.

2 d) Within the Northern Ireland Civil Service, the Department of Finance and Personnel should take responsibility for issuing clear guidance to all Departments.

#### **Comments from follow-up review 2006-2007:**

2 a) It is evident from the questionnaire responses to this follow-up review that each Government Department has nominated a designated officer for child protection.



NICCY is also aware that training in child protection has taken place for these nominated officers. Less clear however is the situation in relation to NDPBs and executive bodies as varying practice still exists in relation to monitoring by Government Departments. The proposals detailed in the Action Plan in relation to issuing guidance and monitoring of funded bodies needs to be accompanied by clear timeframes.

2 b) Given that child protection officers have recently been appointed it would be premature to expect this recommendation to have been actioned across all Departments. It would be NICCY's expectation that this does however happen by the end of this financial year.

2 c) Practice varies significantly in relation to monitoring. This is a very important issue and NICCY notes with concern, for example, the DHSSPS admission that following verification of a voluntary and community organisation's child protection policy, no monitoring or follow-up action is taken. A consistent approach is still required; one which ensures that if Government funds organisations, then their child protection policies, as well as recruitment and selection procedures, are sufficiently monitored to ensure the safety and well being of children and young people. We welcome the proposal in the Action Plan to develop a consistent approach but as stated in 2a above, a clear timeframe for this action is required.

2 d) All respondents referred to the NICS Recruitment Policy and Procedures Manual, and to Choosing to Protect. NICCY notes that DFP did not offer a comment on the adequacy of the guidance; we can only assume that they wished to await the appointment of their designated child protection officer before carrying out an assessment.

## 5.3 STATUTORY AND POLICY FRAMEWORK

5.3.1 As revealed by the initial review, there was significant confusion around who should be vetted, who should report people to be placed on the PECS register (now Disqualification from Working with Children and Vulnerable Adults), who can access disqualification information, and what should be done with the information once it is received. Of particular concern was the position in relation to self-employed people such as home tutors and religious organisations, where the guidance was wholly inadequate.

5.3.2 Government and Public Authorities should be under no illusion that those with a sexual interest in children will always seek to exploit any weaknesses and gaps in systems and processes. Therefore, in order to minimise risks to children and young people, Government cannot afford



to continue with the degree of confusion that was clearly evidenced in the Lavery Report.

- 5.3.3 The initial Review also highlighted a good level of acceptance that vetting should be carried out. Indeed, children and young people were particularly forceful in expressing this view on the issue.

### **Commissioner's Recommendations 2005:**

- 3 a) The Secretary of State must ensure that the requirement to carry out checks on all adults who work with children, not just those in regulated positions, becomes a statutory requirement.
- 3 b) The interdepartmental group (see Recommendation 1 b) should ensure that any areas of policy ambiguity are urgently clarified.
- 3 c) Departments who fund organisations working with children need to be satisfied that staff within those organisations are appropriately recruited and vetted. Common guidance across Departments on this point is desirable.
- 3 d) The implementation of Part V of the Police Act must be adequately resourced to ensure that relevant information and intelligence on those who pose a risk to children is appropriately shared.

### **Comments from follow-up review 2006-2007**

3a) NICCY understands that the proposed Safeguarding Vulnerable Groups Order and Accreditation Scheme will deal with this issue, for both regulated and non regulated individuals. There may however remain a number of positions, for example, self employed children's entertainers who will not be required to be vetted. It must further be remembered that Accreditation will be voluntary. All of the changes must be accompanied by clear guidance and public awareness campaigns, otherwise individuals who seek to harm children will fall through the net. NICCY recommended that clear guidance for parents on how to protect their children when placing them in the Trust of others should be developed, and it is still our view that the absence of action in relation to this is a deficit on the part of Government.

3 b) The developments in relation to POCVA, SVG, and Accreditation appear to cover all the relevant policy gaps identified in Ruth Lavery's report.

3 c) It is evident as stated above that a robust monitoring system of funded organisations remains outstanding.

3 d) The ECRIT team have developed proposals for a system which will be largely self financing. There is a willingness on the part of the team to address difficulties



organisations may have in relation to paying for checks. The out-workings of the system cannot be assessed before the Northern Ireland Disclosure System is established.

## **5.4 CLEAR GUIDANCE, TRAINING AND IMPLEMENTATION**

5.4.1 The Review further highlighted that the entire system of employment checking is not easy to understand. Therefore, there needs to be one universal guidance document which explains how the different elements of the system work, and where people can get help and training with implementation and monitoring. This short document can then be supplemented by related guidance on individual elements of the system.

5.4.2 An area of particular concern is ensuring parents know how to deal with adults who may be working directly with their children, for example, as music or academic tutors, or party entertainers. The lessons learned from the Clywch Inquiry, undertaken by our Commissioner colleagues in Wales, underlines the need for this advice.

### **Commissioner's Recommendations 2005:**

4 a) The interdepartmental group set up to manage policy, guidance and practice should produce an easy-to-read guide for employers on the carrying out of employment checks.

4 b) The interdepartmental group should also produce easy-to-read literature for parents on what to check when employing tutors/instructors who work privately with children. In order to minimise risk this recommendation must be implemented as soon as possible.

### **Comments from follow-up review 2006-2007:**

4 a) The guidance detailed in the responses is quoted as "Choosing to Protect". NICCY has not canvassed the views of employers generally on the usefulness of this document as part of the current follow-up review and suggest this be assessed by the interdepartmental group.

4 b) NICCY has not received evidence that this recommendation has been actioned.



## 5.5 NATIONAL & INTERNATIONAL COOPERATION

5.5.1 Northern Ireland is a relatively small place. Movement of workers between Northern Ireland, the U.K and the Republic of Ireland is commonplace and we now also have an increased migrant population. The current vetting system in ROI is still being developed and is not currently as comprehensive as that in Northern Ireland. It is therefore vital that we ensure consistent practice across the jurisdictions. Where new improvements have been introduced, for example, following the Bichard Inquiry, we should consider their applicability to Northern Ireland. Furthermore, where weaknesses are identified, we should use our influence to improve practice in other jurisdictions.

### **Commissioner's Recommendations 2005:**

- 5 a) The Secretary of State should ensure that all relevant recommendations from the Bichard Inquiry are being applied in Northern Ireland.
- 5 b) The Secretary of State should collaborate with relevant authorities in the Republic of Ireland to ensure consistent standards of vetting North and South of the border.
- 5 c) Although outside the responsibilities of Northern Ireland Departments and the Northern Ireland Office, this review has highlighted the need to extend reciprocal arrangements for sharing information across European jurisdictions, for child protection purposes. The Secretary of State should propose to his cabinet colleagues that further work is done on this issue, especially during the imminent UK presidency of the European Union.

### **Comments from follow-up review 2006-2007:**

- 5 a) Members of the ECRI team and other Departmental Officials from OFMDFM and DHSSPS have been fully engaged in the delivery of the Bichard Recommendations.
- 5 b) Recent concerns about the movement of convicted paedophiles across the border between Northern Ireland and the Irish Republic have brought the need for consistent standards of vetting once again into the limelight. In the OFMDFM Action Plan there is reference to work taking place in relation to this, but details and timeframes are not specified. The Plan does reference a memorandum of understanding and protocols having been developed between NI and ROI on the sharing of information and intelligence on the movement and registration of sex offenders in both jurisdictions. It is NICCY's understanding that there are constitutional difficulties within the Republic of Ireland in relation to vetting which still need to be addressed before this recommendation can be effectively implemented.



5 c) The OFMDFM Action Plan advises that a UK Central Authority has been established under an EU Directive to enable sharing of the criminal convictions of foreign nationals. There remains the outstanding issue of the movement of other individuals across Europe, and access to information about them which may protect children.



## **Chapter 3**

### **6.0 Follow-up Vetting Review 2006/07: Conclusion and Recommendations**

- 6.1 Almost three years ago, The Northern Ireland Commissioner for Children and Young People (NICCY) raised concerns about the possibility of adults who present a risk to children, working in a voluntary or paid capacity with this vulnerable group. The initial Vetting Review commissioned by NICCY identified gaps in the vetting systems and highlighted the need for clarity in terms of policies, procedures and guidance. NICCY's Review coincided with the out-workings of the BICHARD enquiry in England, where considerable legislative, policy and practice changes were recommended.
- 6.2 Much work has and continues to take place in Northern Ireland, aligned to the reforms in England and in consideration of the recommendations made by NICCY to improve vetting systems. It is important however to continue to be vigilant, in terms of quality assuring and evaluating the systems; providing guidance which is easy to understand; ensuring wider awareness of child protection by having good recruitment, selection procedures and supervision arrangements, and child protection policies which are strictly adhered to; and making information widely available to children and their carers around self protection.
- 6.3 While commending the work that has taken place so far, NICCY has identified a number of outstanding issues which are detailed in the recommendations below:

#### **Recommendations**

1. The Ministerial subgroup on children should provide an annual update on progress made against both NICCY's initial Vetting Review and this subsequent follow-up Review, with clear timeframes for action.
2. The Ministerial subgroup needs to ensure that vetting and child protection responsibilities are accepted by each Department; and a written undertaking of these responsibilities provided annually by the relevant accounting officer in the Foreword to the organisation's annual accounts.
3. The proposals detailed in the Government's Action Plan in relation to issuing guidance and monitoring of funded bodies need to be accompanied by clear timeframes for completion.
4. DHSSPS as the lead Department, together with other Departments, should produce guidance for children and parents on self protection, especially





- in relation to the use of self-employed tutors, entertainers etc.
5. The Secretary of State must pursue action across the European Union with the view to developing systems which strengthen the protection of children, e.g. appropriate sharing of information in relation to those who pose a risk to children.



## Appendix 1

### COMMISSIONER'S THEME - CLEAR LEADERSHIP

a The Secretary of State, taking a personal interest in ensuring the implementation of the recommendations detailed in NICCY's vetting review and Ruth Lavery's report.

b The establishment of an effective interdepartmental group to manage and ensure the effective co-ordination of policy and practice in this area.

Recommendation No.	Lead Department(s)	Action – underway
11. The management of the vetting system should be integrated across the responsible Departments.	NIO	<p>Part V of the Police Act 1997 will be implemented in Northern Ireland in 2007. This will deliver a single criminal history disclosure body, Access Northern Ireland (ANI), governed by a statutory framework and supported by regulations. Employers will be required to register to receive disclosures and as part of this they will be required to comply with a statutory code of practice, including requirements on the use of information. This will tighten up procedures in the relevant sectors and should lead to the adoption of best practice amongst registered bodies.</p> <p>Also note response to recommendation 8 below in relation to co-ordination of vetting arrangements across government departments.</p>
2. Ensure that all Northern Ireland Government Departments accept their responsibilities for child protection.	All Departments	A senior official from all departments with responsibility for child protection is now in place. Each official has received child protection training, delivered by the Volunteer Development Agency. Each department will be responsible for the assessment and identification of child protection risks. Where risks are identified, these will be



		included on the department's risk register, which will also provide details of how identified risks will be mitigated and managed. These will be considered in the overall context of audit and risk arrangements. Departments will also require Non-departmental Sponsored Bodies, Executive Agencies and funded organisations to demonstrate that they have similar child protection risk assessment and management processes in place and that these are supported by an appropriate child protection policy. We will produce guidance on the assessment and management of child protection risks to ensure uniformity of practice across departments.
3. Ensure that reformed vetting arrangements comply with the standards in the UN Convention on the Rights of the Child.	All Departments	As indicated in Government's original response we will seek to ensure that all future reform measures linked to employment checking/vetting comply with the relevant articles of the UNCRC.
8. Consider establishing a single interdepartmental body responsible for the management of the vetting system which would work towards integration of the information used in checking, consistency in the posts checked, and the issuing of consistent guidance on vetting policy and practice.	All Departments	<p>Government's original response placed responsibility for oversight of the implementation of the review recommendations on the Ministerial Sub-Committee on children and young people, chaired by the Minister for Children and Young People.</p> <p>The Ministerial Sub-Committee will be kept fully informed of ongoing vetting reform, linked to the wider Bichard agenda, through the Bichard Co-ordination Group (BCG). This will include progress on the new vetting and barring scheme, which Ministers have agreed will extend to Northern Ireland. Progress on the implementation of Part V of the Police Act and establishment of a new Northern Ireland disclosure body, Access NI, will also be reported to Ministers through BCG. We will also continue to maintain links with Bichard implementation in other parts of the UK, through representation on the Home Office-led Bichard Steering Group and Programme Board.</p> <p>Specific reference to guidance can be found under recommendation 25.</p>



COMMISSIONER'S THEME - CONSISTENT POLICIES & AUDITING

a The Secretary of State should instruct every Department, Council, Agency, NDPB, and affiliated government body to nominate a child protection manager with Board level responsibility, whose responsibility it is to develop policies and practice in relation to the employment of staff working with (or who have any contact with) children, and also monitor practice in this area. Only where a body can conclusively demonstrate that they (or agencies they sponsor) have absolutely no contact with children should they be given a derogation from this requirement.

b The Secretary of State should require all public bodies to sign off in the foreword to their annual accounts that they have an appointed Child Protection manager, that Child Protection risks are regularly assessed and minimised, and that they are following appropriate recruitment and selection guidelines.

c The Permanent Secretary within each Department should ensure the implementation and monitoring of appropriate policies by the associated sponsored bodies/next step agencies/funded partnerships.

d Within the Northern Ireland Civil Service, the Department of Finance and Personnel should take responsibility for issuing clear guidance to all Departments.

Recommendation No.	Lead Department(s)	Action underway
1. Ongoing review of the development and implementation of the vetting system as the various reforms are implemented.	All Departments	See response to recommendation 8 above.



<p>12. The implementation of current reforms should take account of the need to prepare for a registration scheme.</p>	<p>NIO, DHSSPS</p>	<p>The Safeguarding Vulnerable Groups Act 2006 (SVGA) received Royal Assent on 8 November 2006. The Act is a cross-jurisdictional/cross-government response to Bichard recommendation 19, linked to the establishment of a registration scheme. In Northern Ireland, work is underway to extend arrangements here by Order in Council, under the negative resolution procedure. DHSSPS is currently consulting on the implementation of the arrangements in the Safeguarding Vulnerable Groups Act 2006. The consultation exercise will run until 16 February 2007. The full text of the Act and explanatory notes are available on: <a href="http://www.everychildmatters.gov.uk/vettingandbarring">www.everychildmatters.gov.uk/vettingandbarring</a></p> <p>In summary, the SVGA will give effect to a new vetting and barring scheme. A key component of the scheme will be that individuals who wish to work in regulated and controlled positions will have to be monitored. Employers will be able to access information to confirm the individual is being monitored and not barred. Access to barring information will also be available to parents for a range of private family arrangements, such as babysitting, au pairs etc. This gives effect to recommendation 19 in the Bichard Inquiry.</p> <p>An Independent Barring Board (IBB) will be established which will consider referrals/convictions from a number of sources/criminal records in England, Wales and Northern Ireland on whether an individual should be barred from working with children and/or vulnerable adults. Transitional arrangements/subordinate legislation will address the transfer of those currently on the Northern Ireland Disqualification lists to the new Children's and Adults' barred lists.</p> <p>In Northern Ireland, access to monitoring and barring information will be through Access NI. See recommendation 11 above.</p>
--	--------------------	---



<p>27. Each relevant Department needs to ensure that there is appropriate <u>monitoring of organisations who are required to carry out checks and on what posts.</u></p>	<p>All relevant Departments</p>	<p>Government will use a number of mechanisms to oversee compliance with current and future requirements.</p> <p>The SVGA and equivalent Northern Ireland Order will impose very clear requirements on employers in relation to regulated and controlled positions under the legislation. Very serious criminal sanctions are imposed on both individuals and employers for failure to comply with requirements.</p> <p>Monitoring mechanisms will include:</p> <ul style="list-style-type: none"> <li>• Regulatory compliance by the Regulation and Quality Improvement Authority (RQIA) in terms of the HPSS, the Education and Training Inspectorate (ETI) in education, DCAL and DEL and workforce regulators such as Northern Ireland Social Care Council (NISCC) and General Teaching Council (GTC);</li> <li>• PSNI will be responsible for investigating any criminal offences established under current provisions and the new Act and Northern Ireland Order;</li> <li>• Via the work of the Bichard Co-ordination Group (see recommendation 8 earlier);</li> <li>• Non-compliance with the requirement to carry out checks in respect of regulated positions under POCVA and new requirements under SVGA will also be considered in the context of child protection risk assessment, mitigation, management and reporting arrangements by each department; and</li> <li>• DFP will ensure that departments are familiar with employment checking requirements under existing (POCVA) and proposed (SVGA) legislation. Departments, in turn, will ensure that guidance under POCVA and SVGA is circulated to relevant NDPBs, Executive Agencies and funded organisations.</li> </ul>
--	---------------------------------	--



28. All Government Departments should clearly <u>allocate responsibility for monitoring and auditing vetting arrangements</u> in relation to all bodies working with children.	All Departments	See recommendations 2 and 27 above.
29. The potential for making insurance for children's play and leisure activities conditional on appropriate recruitment safeguards, including vetting, should be explored.	All Departments	Agreed that Commissioner would act on this recommendation (December 2005).
30. DFP needs to ensure centralised guidance on both recruitment and child protection policies, which can be tailored to the needs of each Department when it is recruiting people to work with children.	DFP	<p>NICS Recruitment Service Policy and Procedures manual states: <b>"Human Resource Managers with responsibility for recruitment and selection to the NICS have responsibility for ensuring that competitions to appoint staff to 'regulated positions' correctly identify such positions to those managing their recruitment and selection and ensure a POCVA check is carried out on all appointees before any offers of appointment are made"</b>.</p> <p>The manual is managed by Central Personnel Group (CPG), DFP. CPG will ensure that the manual is updated to reflect forthcoming legislative change under SVGA.</p> <p>In addition, a central generic child protection policy document is being developed by DFP. It is intended that the policy will be in place by March 2007 and will be circulated to all child protection nominees.</p>
34. Each Department should take responsibility for compliance with vetting standards	All Departments	See recommendations 2, 8, 27 and 28 above.





COMMISSIONER'S THEME - STATUTORY & POLICY FRAMEWORK

- a The Secretary of State must extend the statutory requirement of checking those in regulated positions to all adults who work with children.
- b The Inter-departmental group (see Recommendation 1(b)) should make sure that any areas of policy ambiguity are urgently clarified.
- c Departments which fund organisations that work with children need to be satisfied that staff within those organisations are appropriately recruited and vetted. Common guidance across departments on this point is needed.
- d The implementation of Part V of the Police Act must be adequately resourced to ensure that relevant information and intelligence on those who pose a risk to children is appropriately shared.

Recommendation No.	Lead Department(s)	Action underway
10. Legislation governing a registration scheme which bars individuals from working with children should extend to Northern Ireland. The implementation of current reforms should take account of the need to prepare for a registration scheme.	NIO, DHSSPS, DE	See recommendation 12 above.



<p>14. PSNI should consider back checking the accuracy of existing records.</p>	<p>PSNI</p>	<p>An audit of Criminal Record information has been carried out both by Criminal Justice Department and by the Data Protection Unit, PSNI.</p> <p>Of the random sample of records examined, only one error was identified, which related to an incorrect fine amount.</p> <p>Records were examined against those held by the Northern Ireland Court Service to confirm that the information was correct in all cases examined.</p>
<p>15. Consider reforms in criminal law which extend beyond sexual offences and include the scope of the criminal law as it protects children from all sorts of harm.</p>	<p>NIO</p>	<p>NIO has recently finished consulting on the reform of the law on sexual offences in Northern Ireland and is examining introduction of equivalent provisions equivalent to Sections 1-13 of the Sexual Offences Act 2003. These will introduce a range of new child sex offences with higher tariffs as well as remove the defence of consent for offences with children under 13. It is intended to introduce new legislation in late 2007.</p> <p>DHSSPS is completing a review and revision of HSS Circular 3/96. This will extend monitoring and tracking arrangements for all schedule 1 offenders under the Children and Young Persons (Northern Ireland) Act 1968 and individuals thought to pose a risk to children specifically or generally.</p> <p>MASRAM guidelines have been developed to include assessment and risk management of those who are subject to Risk of Sexual Harm Orders (RSHOs) and non-adjudicated offenders, who pose a risk, can be assessed as potentially dangerous sex offenders.</p>



		NIO has announced that the current multi agency MASRAM arrangements will be extended to include serious violent offenders and that arrangements will be placed on a statutory footing. NIO is considering possible models for a co-located public protection unit and also intends to bring in sentences for public protection similar to those that have been introduced in England and Wales.
<b>16. NIO needs to reconsider the scope of the duty to report suspected criminal conduct against children in the review of criminal offences against children.</b>	DHSSPS	<p>DHSSPS is currently consulting on the creation of a statutory Safeguarding Board for Northern Ireland (SBNI) to replace the current non-statutory Area Child Protection Committees (ACPCs). Operationally, the Board will be underpinned by a statutory duty to co-operate to safeguard which will be applied to a wide range of departments and organisations.</p> <p>In addition, the SVGA places a statutory duty on a range of bodies: Regulators, holders of statutory Registers and local authorities to refer conduct and risk of harm cases to IBB. Other bodies and organisations have a common law power to do so.</p> <p>PSNI, social services and the NSPCC are at the advanced stage of developing an Information-Sharing Protocol. This gives effect to the recommendation in the Chris Kelly Serious Case Review to formalise information-sharing arrangements. The aim of the protocol is to ensure that information about individuals who pose a risk is formally communicated to PSNI for inclusion on its intelligence database. The material may become relevant to disclosures made under Part V of the Police Act and included on an Enhanced Disclosure Certificate issued by Access NI.</p>
<b>17. The system for accessing findings and</b>	NIO	The Serious Organised Crime Act 2006 provides ability to identify and access additional databases which may



information held by military authorities indicating that a person poses a risk of harm to children should be explored further.		contain information relevant to disclosure. We have worked with the Home Office to ensure that those provisions of the Act extend to Northern Ireland. Once Access NI is firmly established, the scope to deploy this legislation, including accessing MOD databases, will be considered.
18. NIO should give further consideration to whether and how a Risk of Sexual Harm Order or Notification Order can be included on the database of those who pose a risk to children.	NIO	<p>PSNI ensure that details of Risk of Sexual Harm and Notification Orders are added to ViSOR and cross-referenced to the Police Integrated Intelligence System (ICIS). This information may be disclosed under Part V of the Police Act under the enhanced disclosure process through Access NI.</p> <p>Under MASRAM, arrangements have been put in place to risk assess and manage individuals for whom a Risk of Sexual Harm Order or a Notification Order application is made. These arrangements are unique to Northern Ireland.</p> <p>Under the SVGA, an individual subject to a Risk of Sexual Harm Order will be referred to IBB for consideration under the discretionary barring arrangements in the Act.</p>
19. There needs to be a reconsideration of <u>what available information, which indicates that someone is unsuitable to work with children</u> , should be used as the basis for vetting, and consideration of the safeguards governing access to such information.	NIO	<p>In Northern Ireland, an individual's suitability to work with children is currently determined under POCVA and disclosed under arrangements operated by DHSSPS and PSNI. An individual considered unsuitable to work with children is added to the Disqualification from Working with Children List. In future, barring decisions will be made in line with the provisions of SVGA. Disclosure of information, which may define an individual's unsuitability to work with children will be governed by Part V of the Police Act, when implemented. Under the highest level of checking in Part V (the Enhanced disclosure) the following information may be examined:</p> <ul style="list-style-type: none"> <li>○ Police National Computer</li> </ul>



		<ul style="list-style-type: none"> <li>○ Causeway Criminal Records system</li> <li>○ Disqualification from Working with Children List (NI)</li> <li>○ Disqualification from Working with Vulnerable Adult List (NI)</li> <li>○ Protection of Children Act List (E/W)</li> <li>○ Protection of Vulnerable Adult List (E/W)</li> <li>○ Disqualification from Working with Children List (Scotland)</li> <li>○ Unsuitable Persons List (UK)</li> </ul> <p>The Serious Organised Crime Act 2006 provides ability to identify and access additional databases which may contain information relevant to disclosure. Once Access NI is firmly established, the scope to deploy this legislation will be considered.</p>
22. The difference in the posts included in the Northern Ireland section of list 99, from those in England and Wales needs to be reconsidered by DE.	DE	<p>DE has taken action to address this with the Education (Prohibition from Teaching or Working with Children) Regulations (Northern Ireland) 2006. The department is in the process of creating an Unsuitable Persons (UP) List which will include both teaching and non-teaching staff. The department is working closely with DHSSPS to establish analogous systems for the listing of unsuitable people. Transitional arrangements are currently underway to move names from List 99 to the UP list. It is expected that around 30 people will be moved from List 99 to the UP list. It is expected that the transfer process will be completed by the end of March 2007.</p>



<p>23. DHSSPS, NIO, DE and PSNI should collaborate to ensure that there is a consistent statutory definition of the type of contact with children which warrants a check being carried out; and the concepts used in the Police Act 1997 as amended, in the Protection of Children and Vulnerable Adults (NI) Order 2003, the list of exceptions under the Rehabilitation of Offenders (Exceptions) Order (NI) 1979, and the basis for inclusion in List 99, should be compared with view to ensuring such consistency.</p>	<p>NIO, DHSSPS, DE, PSNI</p>	<p>POCVA clearly sets out which posts and which organisations should carry out vetting checks. The range of posts requiring a check will be redefined and extended under SVGA, which will also establish clear criminal sanctions for failure to meet checking requirements.</p> <p>As indicated above, disclosure (checking) arrangements will also be significantly streamlined under implementation of Part V of the Police Act in Northern Ireland.</p> <p>The Government is working to ensure there is a consistent legislative and operational understanding of the type of contact with children and young people which triggers the requirement for checking.</p>
<p>25. Clear and comprehensive guidance is needed on the posts covered by the definition of regulated position. Consideration should be given to extending the definition to cover existing posts, and a broader range of positions of trust. The application of the definition to children in employment should be kept under review.</p>	<p>DHSSPS</p>	<p>Article 31 of POCVA and Choosing to Protect guidance produced by DHSSPS clearly sets out the definition of a 'regulated position'. This definition will change under the Northern Ireland equivalent of SVGA.</p> <p>In addition, both DHSSPS and DE have issued new circulars and advice dealing with respective aspects of current vetting arrangements. Access NI will also issue guidelines on new disclosure arrangements, established under Part V of the Police Act. Copies of the DE guidance and circulars can be downloaded from <a href="http://www.deni.gov.uk">www.deni.gov.uk</a> We understand that the department has already forwarded copies of both to the Commissioner. DHSSPS guidance, <i>Choosing to Protect</i>, can be found at <a href="http://www.dhsspsni.gov.uk/poc/pdf">www.dhsspsni.gov.uk/poc/pdf</a></p> <p>Further guidance will also be developed in advance of the move to the new vetting and barring arrangements under the Northern Ireland equivalent of SVGA.</p>



<p>26. The question of who must carry out checks requires reconsideration. There should be a duty to check all individuals working in a regulated position.</p>	<p>DHSSPS, NIO</p>	<p>POCVA currently requires all childcare organisations to carry out checks on those working in regulated positions. Other organisations <b>may</b> carry out checks on those working in regulated positions.</p> <p>In guidance issued by DHSSPS, <i>Choosing to Protect</i>, see link above, the department strongly recommends that all organisations carry out checks on those working in regulated positions.</p> <p>Requirements will change under the Northern Ireland equivalent of SVGA. As indicated above, the new vetting, barring and disclosure arrangements will be supported by comprehensive guidance.</p>
<p>32. The basis for disqualification from working with children should be reconsidered. It should be consistently linked to the risk an individual's conduct poses to children.</p>	<p>DHSSPS</p>	<p>POCVA clearly sets out the criteria for referral to the disqualification lists and the tests to be followed before including an individual on the Disqualification from Working with Children and Vulnerable Adults Lists. Case law from the Care Standards Tribunal in England and Wales and the Care Tribunal in NI is used to assist the decision making process. When the SVGA commences, an Independent Barring Board (IBB) will make all discretionary barring decisions, resulting in a uniform and consistent approach to barring. The operation of IBB will be set out in subordinate legislation.</p>
<p>33. The implementation of accreditation needs to be monitored to identify the number and type of organisations for which it is an effective mechanism for setting standards</p>	<p>All Departments</p>	<p>DHSSPS is currently consulting on accreditation proposals in Northern Ireland. Accreditation, as defined under POCVA, is unique to Northern Ireland. It will be used to bring an added layer of protection to organisations by promoting and kite marking good child protection and recruitment standards in the parallel provisions under SVGA.</p> <p>The development of accreditation arrangements will be taken forward by DHSSPS, working in cooperation with the POCVA Implementation Group. Implementation of accreditation arrangements will be overseen by the Safeguarding Board Northern Ireland when it is brought into operation later in 2007. The aim is to ensure cross agency buy in.</p>





<p>5. Ensure that the implementation of reforms are supported by adequate resources so that an efficient user-friendly system is created.</p>	<p>NIO, DHSSPS, DE</p>	<p>NIO Is committed to providing the resources necessary to deliver Access NI.</p> <p>DHSSPS Permanent Secretary has written to all government departments to ask that each considers the impact of the SVGA on the department and to identify resources to bring forward equivalent provisions in Northern Ireland. One proposal is to establish an inter-departmental team to implement the legislation in Northern Ireland. If established, the team will consider all aspects of the Order's implementation, including the level of resource required.</p>
---	------------------------	--



Commissioner's Theme - Clear Guidance, Training and Implementation

- a The interdepartmental group set up to manage policy, guidance and practice should produce an easy-to-read guide for employers on the carrying out of employment checks;
- b The interdepartmental group should also produce easy-to-read literature for parents on what to check when employing tutors/ instructors who work privately with children.

Recommendation No.	Lead Department(s)	Action underway
35. DHSSPS needs to develop clear guidance on the proper use of the information provided in the recruitment process, building on the work already done.	DHSSPS	DHSSPS has produced comprehensive guidance for organisations using the vetting service and how to interpret this information. The guidance is "Choosing to Protect" and is available on DHSSPS website. In addition, the DHSSPS have contracted the Volunteer Development Agency to carry out POCVA awareness sessions to the voluntary, community and statutory sectors. These sessions include advice from NIACRO on employing individuals with convictions.
36. There is a need for fuller and more effective information and training on the vetting system.	NIO, DHSSPS, DE	<p>Awareness-raising of current statutory provisions has taken place through a range of mechanisms and fora:</p> <ul style="list-style-type: none"> <li>- DHSSPS guidance, <i>Choosing to Protect</i>, which is available on <a href="http://www.dhsspsni.gov.uk/publications">www.dhsspsni.gov.uk/publications</a>;</li> <li>- DHSSPS officials have taken part in a number of awareness raising seminars and conferences;</li> <li>- The award of a contract to the Volunteer Development Agency to carry out POCVA awareness sessions to the voluntary, community and statutory sectors. These sessions include advice from NIACRO on employing individuals with convictions;</li> </ul>



		<ul style="list-style-type: none"> <li>- Through Health and Social Service Boards, funding of organisations, for example Community Sector Training, to provide advice and guidance on best practice and awareness of POCVA;</li> <li>- The Department of Education, in partnership with DEL and key stakeholders, conducted a wide ranging review of existing vetting arrangements within education. The review resulted in a suite of new guidance for the schools and Further Education sectors and the Careers Service on all aspects of the vetting process and the launch of programmes to extend vetting coverage in each.</li> </ul> <p>In addition, Access Northern Ireland will provide detailed guidance to Registered bodies, including a code of practice and will work with existing training suppliers in the sector to ensure effective information on the new disclosure service is supplied.</p> <p>Finally, the position in relation to guidance to support new vetting and barring arrangements is set out above. The introduction of new arrangements will also be supported by public awareness campaigns.</p>
37. Organisations seeking accreditation must be fully supported by the necessary training and resources.	DHSSPS	See recommendation 33 above.



Commissioner's Theme - National and International Co-operation

a The Secretary of State should ensure that all relevant recommendations from the Bichard Inquiry are being applied in Northern Ireland.

b The Secretary of State should collaborate with relevant authorities in the Republic of Ireland to ensure consistent standards of vetting North and South of the border.

c Although outside the responsibilities of Northern Ireland Departments and the Northern Ireland Office, this review has highlighted the need to extend reciprocal arrangements for sharing information across European jurisdictions, for child protection purposes. The Secretary of State should propose to his cabinet colleagues that further work is done on this issue, especially during the imminent UK presidency of the European Union.

Recommendation No.	Lead Department(s)	Action underway
24. DHSSPS and NIO should issue a guide to securing vetting on workers from other jurisdictions.	NIO	The UK Government will work to develop agreements and protocols with other countries in the provision of criminal record and soft intelligence and will provide guidance on this issue in due course.
7. Be satisfied that everything possible is being done to encourage the implementation of reform in the Republic of Ireland and to develop effective and compatible vetting arrangements throughout Ireland.	NIO, OFMDFM	Officials have worked closely with colleagues in RoI to develop improved co-operation on vetting and barring arrangements. This has included discussion at Ministerial level, through British Irish Intergovernmental Conference meetings.



		<p>A UK Central Authority has been established under an EU Directive to enable the sharing of Criminal Convictions of Foreign Nationals between their Home Country and the Member State where they have been convicted and for information to be requested from the Home Country. Work is ongoing in Northern Ireland and other jurisdictions.</p> <p>Memoranda of Understanding and Protocols have been agreed with the Government of the RoI and the UK also the police on both sides of the border around the sharing of information and intelligence on the movement and registration of sex offenders in both countries.</p>
<p>9. Government Departments and bodies in Northern Ireland are committed to following the recommendations of the Bichard Report and have engaged with the reform process it generated. It is important that this commitment remains and is fully supported by adequate inclusion in legislation originating in England and Wales, and by adequate resources.</p>	All Departments	<p>Northern Ireland has played a leading role in the development of the Bichard Vetting and Barring Scheme which, for the first time, will operate a truly UK system for vetting and crucially, monitoring those working with the vulnerable.</p> <p>The complex issue of access to international criminal histories is being taken forward at a national level by the Home Office.</p> <p>See also recommendation 7 above.</p>

